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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CATARINO CHAVEZ-GONZALEZ,  
aka "Catarino Chavez,"

Defendant.

Case No. 2:20-mj-00947-NJK

**Stipulation for an Order  
Directing Probation to Prepare  
a Criminal History Report**

IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich, United States Attorney, and Jared L. Grimmer, Assistant United States Attorney, counsel for the United States of America, and Brandon C. Jaroch, Assistant Federal Public Defender, counsel for Defendant CATARINO CHAVEZ-GONZALEZ, that the Court direct the U.S. Probation Office to prepare a report detailing the defendant's criminal history.

This stipulation is entered into for the following reasons:

1           1.       The United States Attorney's Office has developed an early disposition  
2 program for immigration cases, authorized by the Attorney General pursuant to the  
3 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has  
4 extended to the defendant a plea offer in which the parties would agree to jointly request an  
5 expedited sentencing immediately after the defendant enters a guilty plea.

6           2.       The U.S. Probation Office cannot begin obtaining the defendant's criminal  
7 history until after the defendant enters his guilty plea unless the Court enters an order  
8 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of  
9 a defendant's initial appearance when charged by indictment.

10          3.       The U.S. Probation Office informs the government that it would like to begin  
11 obtaining the criminal history of defendants eligible for the early disposition program as  
12 soon as possible after their initial appearance so that the Probation Office can complete the  
13 Presentence Investigation Report by the time of the expected expedited sentencing.

14          4.       Accordingly, the parties request that the Court enter an order directing the  
15 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

16               DATED this 2nd day of November, 2020.

17                               Respectfully submitted,

18                               NICHOLAS A. TRUTANICH  
19                               United States Attorney

20       /s/ Brandon C. Jaroch  
21       BRANDON C. JAROCH  
22       Assistant Federal Public Defender  
23       Counsel for Defendant CATARINO  
24       CHAVEZ-GONZALEZ

20       /s/ Jared L. Grimmer  
21       JARED L. GRIMMER  
22       Assistant United States Attorney

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**Order Directing Probation to Prepare  
a Criminal History Report**

Based on the stipulation of counsel, good cause appearing, and the best interest of justice being served:

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this 3rd day of November, 2020.

  
\_\_\_\_\_  
HONORABLE NANCY J. KOPPE  
UNITED STATES MAGISTRATE JUDGE